

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BEN JACKSON,

Plaintiff,

vs.

NOVARTIS PHARMACEUTICALS
CORPORATION AND MERCK & CO., INC.,

Defendants.

Civil Action No.: 1:07-cv-02958

**DEFENDANT'S DISCLOSURE
STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, counsel for Defendant, Novartis Pharmaceuticals Corporation ("NPC"), hereby discloses and certifies that, to the best of my knowledge and belief, the following is a complete list of NPC's parent corporations and publically held companies that own 10% or more of NPC's stock:

1. Parent Companies:

- (1) Novartis Finance Corporation, a New York corporation;
- (2) Novartis Corporation, a New York corporation;
- (3) Novartis Holding, AG, a Swiss company; and
- (4) Novartis AG, a Swiss company, publically traded on the New York Stock Exchange.

2. Subsidiaries not wholly owned by NPC:

- (1) Novartis Biotech Partnership, Inc.

3. Publically held companies owning more than 10% of NPC stock:

(1) Novartis AG indirectly owns a 100% interest in NPC.

Dated: May 8, 2007

Respectfully submitted,

s/ Ethan D. Stein

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CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2007, the Defendant's Disclosure Statement was filed with the Clerk of the Court and served in accordance with the Southern District's Rules on Electronic Service upon the following parties and participants:

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I further certify that on May 8, 2007, I served a true and correct copy of the foregoing Defendant's Disclosure Statement by United States Mail, postage prepaid, on:

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s/ Ethan D. Stein

Ethan D. Stein